UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

REPLY TO THE ATTENTION OF
WC-15J

NOV 0 1 2018

CERTIFIED MAIL AND ELECTRONIC MAIL **7016 3560 0000 4829 7774**
RETURN RECEIPT REQUESTED

Ex. 6 (Personal Privacy)
Ex. 6 (Personal Privacy) Beef, Inc.
Ex. 6 (Personal Privacy)
Ex. 6 (Personal Privacy)

Subject: September 2018 Clean Water Act Compliance Inspection

Dear Mr Ex. 6 :

Enclosed, please find a copy of the U.S. Environmental Protection Agency Inspection Report for the Clean Water Act (CWA) Compliance Evaluation Inspection (CEI) for Ex. 6 (Personal Privacy) Beef, Inc in Geneso, Illinois as conducted by the U.S. Environmental Protection Agency on September 6, 2018. The purpose of the CEI is to evaluate and document if Weber Beef, Inc is in compliance with the applicable provisions of the CWA.

Should you find anything in the report with which you disagree, please provide a detailed response within thirty (30) calendar days. Thank you for your time and assistance during the inspection. At this time, EPA does not anticipate any further action related to this CEI.

If you have any questions, please contact Ben Atkinson of my staff, at (312) 353-8243 or atkinson.ben@epa.gov.

Sincerely,

Ryan J. Bahr
Section 2 Chief,
Water Enforcement and Compliance
Assurance Branch

Enclosure

Cc: Todd Bennett, IEPA

CWA COMPLIANCE EVALUATION INSPECTION REPORT
U.S. ENVIRONMENTAL PROTECTION AGENCY, REGION 5

Purpose: Compliance Evaluation Inspection

Facility: [redacted] Beef, Inc.
[redacted]

NPDES Permit Number: N/A Unpermitted Large Facility

Date of Inspection: September 6, 2018

EPA Representatives: Ben Atkinson, Agronomist 312-353-8243
Don Schwer, Enforcement Officer 312-353-8752

State Representatives: None

Facility Representatives: [redacted], Owne[redacted]

Report Date: October 17, 2018

Inspector Signature _____

Approver Signature: _____, Chief, Section 2, Wate. Enforcement and Compliance Assurance Branch

Approval Date: 11/1/18

1. BACKGROUND

The purpose of this report is to describe, evaluate and document [redacted] Beef, Inc.'s (Facility) compliance with the Clean Water Act (CWA) at its Geneseo, Illinois facility on 09/06/2018. This inspection was performed pursuant to Section 308(a) of the Federal Water Pollution Control Act, as amended.

The Facility is a large un-permitted cattle Concentrated Animal Feeding Operation (CAFO). The Facility confines approximately 3,000 cattle.

Surface flow from the Facility would flow generally southeast to an unnamed tributary to Big Slough Ditch. The unnamed tributary flows approximately 5.3 miles to Green River. Green River then flows approximately 13 miles to Rock River, a Traditionally Navigable Water.

A Livestock Facility Inspection was conducted the Illinois Environmental Protection Agency on January 26, 2017. That report is attached in Appendix C.

2. SITE INSPECTION

Table 1: Site Entry

Arrival Time:	9:00 AM
Temperature:	68° F
Precipitation:	Light Rain
Presented credentials?	Yes
Credentials presented to whom and at what time?	To the Operator at 9:15 AM
EPA vehicle parked in approved location?	Yes
Location where EPA vehicle was parked?	Adjacent to office
Disposable boots worn?	Yes
Other bio-security measures taken:	Vehicle washed after inspection

2.1 Records Review (The following Records Review tables reflect information provided before the walk-through of the facility, unless otherwise noted.)

Table 2: Documents

Checklist(s) Used	
R5 CAFO Inspection Checklist	
Facility Documents Reviewed:	
Portion of NMP	
If photographs or documents were taken, does the facility consider any to be Confidential Business Information (CBI)?	No

Table 3: Facility Description

Type of Animal	**Number of Animals**	**Capacity**	**Type of Confinement**
Cattle	Approximately 3,000	3,700	Open Lot and total confinement
Minimum Number of Animals in previous 5 years:			1,500
Maximum Number of Animals in previous 5 years:			4,000
Number of Animals that are stabled/confined and/or fed/maintained for 45 days or more in previous 12 months:			3,000
Amount of Liquid Manure Generated per year:			10285780 Gallons
Amount of Solid Manure Generated per year:			3530 Tons
(Illinois Only) Name of Certified Livestock Manager for facility: (if 300 animal units or greater):			[redacted]
(Illinois Only) If 1000 < AU < 5000 is a general waste management plan maintained at the facility?			Yes
Does the facility have an NPDES Permit?			No
SIC code:			0211
CAFO Designation/Defined Reason			Number of animals
Do animals have direct access to WOUS?			No
Are crops, vegetation, forage growth, or post harvest residues sustained in the normal growing season over any portion of the lot or facility where animals are kept?			No
How many employees (not counting family members)?			3
Other facilities under common ownership (name and address):			
Satellite facility north of main facility on north side of Illinois 92			

Table 4: Livestock Waste Storage

Type of Storage	Storage Capacity	Type of Liner	Depth Markers Present	Days of Storage
Holding Pond	1124000 Gal	Earthen	No	150
Settling Pond	268000 Gal	Earthen	No	150
Settling Pond	44000 Gal	Earthen	No	150
Slurry Store	1488000 Gal	Glass-fussed steel	No	270
Deep Under-barn pit	1281260 Gal	Concrete	No	150
Settling Pond	190060 Gal	Earthen	No	150
Settling Pond	142850 Gal	Earthen	No	150
Holding Pond	8947650 Gal	Earthen	No	365
10 Bed Pack Barns	1825 Tons	Concrete	NA	180

Records at site of storage structure design?	Yes
Is manure stored for the short term? If yes, describe where it is stored, how it is drained and where it drains to.	No
Are records kept of the level of manure in the storage structures?	No
When was the last time a storage structure was emptied, either partially or completely?	Spring 2018
Do the facility personnel inspect and keep records of all the water lines?	Inspections are conducted, no records kept
Do the facility personnel perform routine visual inspections and keep records of the production area?	Inspections are conducted, no records kept
Does the waste storage system have a managed outfall or discharge point? If yes, provide a description of the outfall and a description of the area receiving the discharge.	No
Has the facility had any documented discharges of livestock waste to surface water in the past year?	No
Are there safety devices installed around any manure storage ponds? (Barriers at the end of manure push off platforms, fences around pond, signage.)	No

Table 5: Livestock Waste Management

Describe the way manure is collected and disposed of at the facility:	
Feedlots flow by gravity to manure holding ponds. Bedpack barns keep manure and bedding until it is either land applied or moved a solids holding area. A system of pumps gives the facility ability to transfer manure to and from different holding ponds based on the level of manure and storage needs.	
Are mortality records kept?	Yes
Describe the way mortalities are managed at the facility:	
A rendering company picks them up.	
What type of method is used to provide drinking water for the animals?	Wells provide water via tank waterers.
Describe the way spilled drinking water is collected and disposed of at the facility:	
Collected with manure	
Describe the way mist cooling water is collected and disposed of at the facility:	
Collected with manure	
Describe the way water that has been used to wash/flush barns is collected and disposed of at the facility:	
No flushing occurs.	
Describe the way feed is contained and how runoff from feed is collected and disposed of at the facility:	
Feed is stored in feed bins and a feed bunker. Runoff from the feed bunker is collected and handled with manure.	

Table 6: Land Application and Disposal of Manure and Process Wastewater

Does the facility perform and keep records of the manure testing?	Yes
When was the last time a sample was taken of the manure and/or process wastewater?	Spring 2018
Describe the process to take the manure and/or process wastewater sample.	Sampled when spreading
Number of acres available for land application:	1300
Are land application records kept?	Yes
Who applies the manure and process wastewater to the fields?	The Facility or custom land application company

Are weather conditions at time of application kept? (24 before – 24 after)	No
Does the facility perform and keep records of the soil testing?	Yes
Is manure transferred off-site to another party?	Yes
Are manure transfer records maintained?	Yes
Do facility personnel perform periodic inspection of land application equipment?	Yes

Table 7: Receiving Surface Waters

Describe the surface flow pathways:	
Surface flow from the Facility would flow generally southeast to an unnamed tributary to Big Slough Ditch. The unnamed tributary flows approximately 5.3 miles to Green River. Green River then flows approximately 13 miles to Rock River, a Traditional Navigable Water.	
How many months out of the year is there flow in the nearest surface water pathway:	Seasonally
Are there any storm water pathways entering the facility?	No
Are there any clean water ponds on site?	No
What is the name of the first waterway that is identified as a Traditional Navigable Water (TNW) for surface flow from the facility?	Rock River
Is the surface water pathway nearest to the facility considered to be ephemeral, intermittent or perennial?	Perennial
Has the surface water pathway nearest to the facility been assessed for water quality?	No

Table 8: Nutrient Management Plan

NMP on site?	No, with NMP writer for update
Date NMP Submitted:	2009
Planner Name/Company:	Maur Stutz
Date that the NMP was last updated:	2018
Storage Description:	Present
Amount of Manure Generated:	Present
Capacity of Storage:	Present
Duration of Storage:	Present
Amount of Spreadable Land:	Present
Conservation Practices:	Present
Manure Testing Protocols:	Present
Soil Testing Protocols:	Present

Land Application Protocols:	Present
Does the NMP reflect the current operational characteristics?	No

Table 10: Facility Records (details of the records reviewed)

Diversion devices:	**Not Kept**
Impoundments:	**Not Kept**
Depth marker observations:	**Not Kept**
Water Lines:	**Not Kept**
Mortality handling:	**present**
Storage Structure Design:	**present**
Overflow records:	**Not applicable**
Crop Yields:	**Present**
Land Application Dates:	**With NMP writer**
Weather Conditions at time of application (24 before-24 after):	**Not Kept**
Test Methods for Manure Testing:	**With NMP writer**
Test Methods for Soil Testing:	**With NMP writer**
Manure Test Results:	**With NMP writer**
Soil Test Results:	**With NMP writer**
Calculations of N and P applied:	**With NMP writer**
Application Methods:	**With NMP writer**
Application Equipment Inspection Dates:	**Not Kept**

2.2 Walkthrough of the Facility

The inspectors arrived at the facility at approximately 9:00 AM on September 6, 2018. The Inspectors donned their biosecurity boots and approached a farm employee and asked if the Operator was available. The employee stated that he thought that the Operator was at the satellite facility located north of the Facility on the north side of Illinois 92. The inspectors then called the Operator and explained who they were and asked if they could meet. The Operator agreed, and the Inspectors drove across the street to the satellite facility. The inspectors met with the Operator and presented their credentials. They then explained the purpose of the inspection. The Operator stated that he did not have time and could not allow the inspection due to prior commitments. The inspectors asked if it would be possible for them to conduct the facility inspection at that time and then complete the information gathering portion of the inspection at a later date. The Operator agreed to let the Inspectors conduct the facility inspection at that time but that he would not be available to accompany them.

The inspectors began the inspection at the satellite facility north of Illinois 92. The inspection began at the southeast corner of the feedlot (photo 3). The Inspectors walked north along the east side of the feedlot. The Inspectors observed an area at the northeast corner of the feedlot where runoff from the feedlot was contained by wood boards. A small amount of runoff was observed to be seeping from beneath the boards. Additionally, a hole in the east end of the feed bunk allowed stormwater to drain from the feed bunk. The runoff from the feedlot and bunker did not appear to leave the site (photos 4-5).

The Inspectors walked west along the north side of the feedlot then south along the west side. The inspectors then walked west and observed a second feedlot at the satellite facility. The inspectors walked west along the south side a fenced pasture west of the second feedlot to an access road. The inspectors then walked north along the west side of the pasture to observe the west side of the second feedlot. The inspectors observed a bermed area in the corner of the pasture through which a pipe was protruding. No flow was observed to be coming from the pipe (photo 6).

The inspectors then drove back to the main facility. The inspectors called the Operator to let him know they were finished at the satellite facility and were going to begin on the main facility. The operator stated that his father (Operator 2) would accompany the inspectors. Operator 2 joined the inspectors. He stated that, for medical reason, they would have to drive around the facility. The inspectors and Operator 2 began the inspection on the north end of the facility. The inspectors drove northwest along the north access road and observed the feedlots on the north side of the facility (photos 7-8). These lots drained west to a settling pond. The far west feedlot was being used as solid manure storage (photo 9).

The inspectors then traveled south along the west side of the north feed lots then east and south around the central feedlots. The inspectors observed a reception pit which collected the runoff from the central feedlots and pumps it to either the slurry store or a holding pond (photos 10-11). The inspectors then traveled west and observed the remaining feedlots and barns. The inspectors then told the Operator's father that they needed to walk around each storage pond. Operator 2 stated that they could do so, but that he would not be able to accompany them.

The inspectors started at the settling pond on the south side of the facility north of the access road and followed the ditch which flowed from the settling pond to the large settling pond south of the facility (photos 12-16). The inspectors then walked around the large settling pond and the large storage lagoon (photos 17-18). The inspectors then drove north to the manure holding pond on the north side of the facility (photos 19-20). The inspectors walked around the holding pond and observed a dead cow near a barn at the southeast corner of the holding pond waiting to be picked up by the rendering company (photo 21). The inspectors continued walking around the holding pond and observed the manure solids stored in the northwest feedlot. This area drained to a settling pond northeast of the manure holding pond (photos 22-23). The inspectors continued walking around the manure holding pond and noted a number of large trees established

on the northwest side of the manure holding pond (photo 24). No depth gauges were observed at any of the manure holding ponds. The inspectors then drove back to the office building and informed the Operator that the walkthrough of the facility was complete, and that EPA would be in touch to complete the information gathering portion of the inspection.

2.3 Closing Conference and Post-Inspection

Table 12: Post Walk-Through

Were specific "Potential Violations" discussed with facility personnel?	No
Were specific "Areas of Concern" discussed with facility personnel?	No
Exit Time:	11:40 AM
Disposable Boots Left at Facility?	Yes
Vehicle Washed after leaving facility?	Yes

A follow up phone call was completed on October 12, 2018 to finish the information gathering portion of the inspection followed by the submittal of NMP documents by the Facility's NMP writer.

3. AREAS OF CONCERN

EPA observed these areas of concern:

1) Feedlot runoff and feed bunk runoff was observed to be not contained at the satellite facility.
2) Woody vegetation was observed growing around the manure holding pond on the northwest corner of the facility.
3) No depth gauges were observed in manure holding ponds.

4. LIST OF DOCUMENTS RECEIVED FROM FACILITY

- Section 2.2 of the NMP
- Land Application Maps

List of Attachments:
Attachment A – Overview Map
Attachment B – Photo Log
Attachment C – January 26, 2017 IEPA Inspection Report

Attachment A


Ex. 6
Under-Lot Pit
Legend
Manure Pit or Pond
Feed Lot Area
National Hydrography Dataset
Ex. 5 (Deliberative Proces
ef, Inc.
Ex. 6 (Personal Privacy)
Ex. 5 (Deliberative Process)
1 inch = 400 feet
N
W
E
S
Solid Manure Storage at time of inspection
Manure Settling Pond
Manure Holding Pond
Manure Settling Pond
Reception Pit
Slurrystore
Under-Building Pit
Ex. 6
Manure Settling Pond
Manure Settling Pond
Manure Holding Pond
Unnamed Perennial Tributary
to Big Slough Ditch

Attachment B

Ex. 6 (Personal Privacy) Beef
EPA Inspection September 6, 2018
All photos taken by Donald R. Schwer III, Agricultural Engineer, U.S. EPA
Camera: Ricoh WG-4

1: RIMG0370
Description: A facility sign was located at the satellite site along IL-92.
Location: Satellite site along IL-92
Camera Direction: East

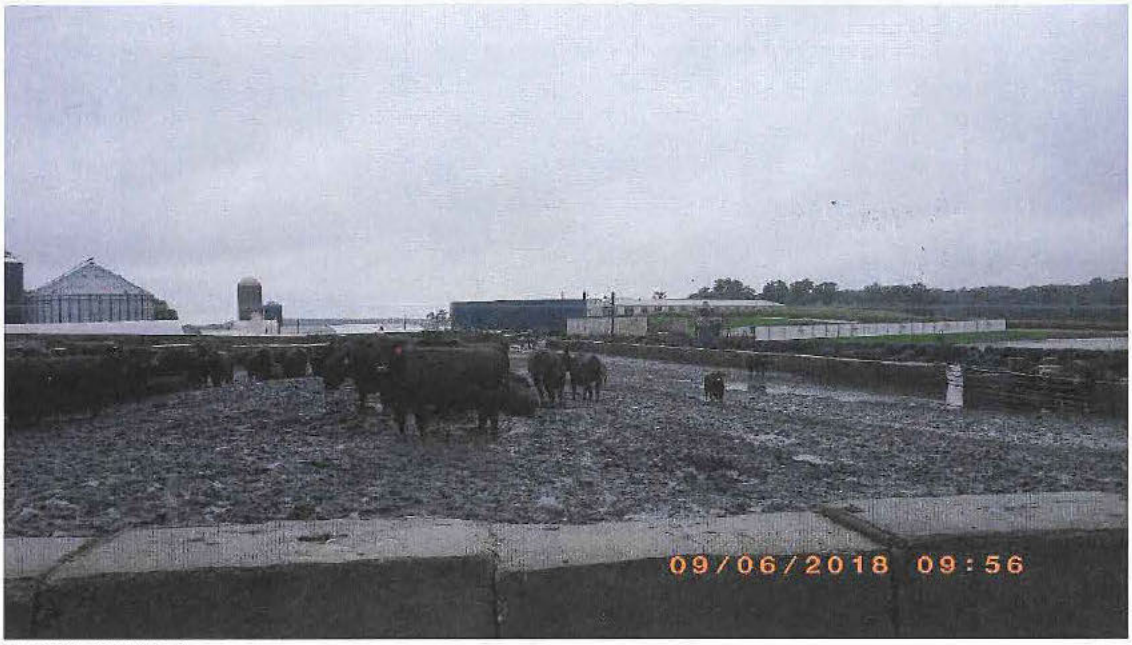
2: RIMG0371
Description: The feedlot at the satellite site contained a concrete slatted floor. The manure pump out location was located along the southern end of the feedlot.
Location: Southern end of the satellite feedlot.
Camera Direction: North

3: RIMG0372
Description: The feedlot at the satellite site contained a concrete slatted floor. Concrete feed troughs were located along the permeter of the feedlot.
Location: Southeast corner of satellite feedlot.
Camera Direction: Northwest

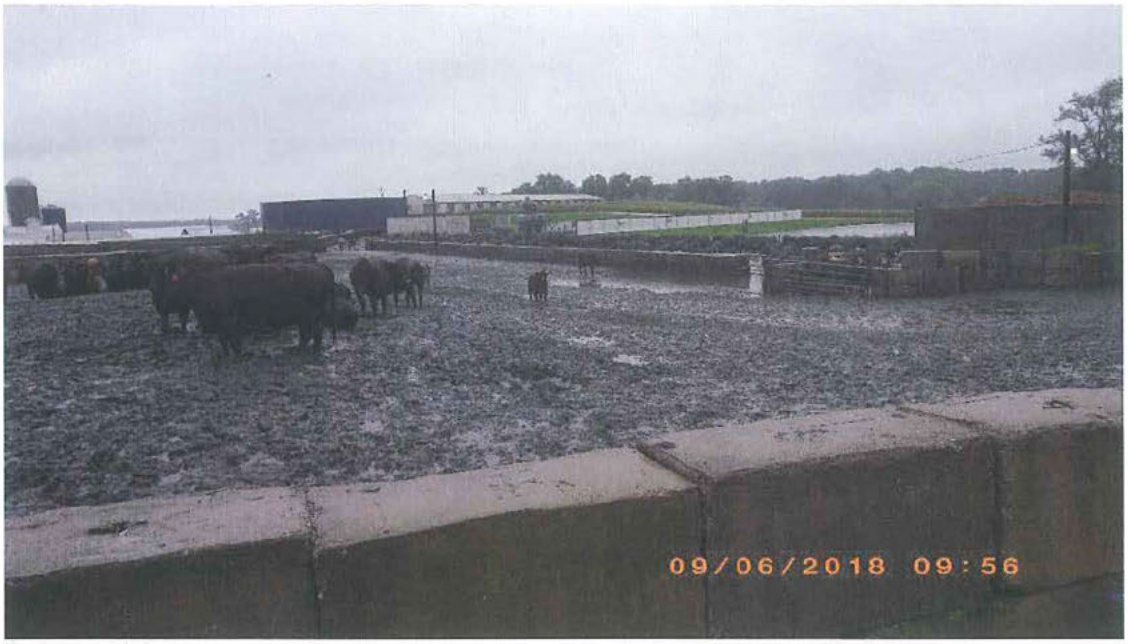
4: RIMG0373
Description: A small amount of manure and feed was observed on the ground at the Northeast end of the satellite feedlot outside the perimeter of feedlot. Stormwater drainage runs east along a small barn. The manure and feed observed did not extend beyond the area of the photo. The final disposition of the runoff of this area could not be verfied during the inspection because no clear overland flow of water was apparent.
Location: Northeast end of the satellite feedlot.
Camera Direction: Southwest

5: RIMG0374
Description: The runoff pathway along the north end of the small barn flows east.
Location: Northeast end of the satellite feedlot.
Camera Direction: East

6: RIMG0375
Description: A pipe was located at the southwest end of a cattle pasture. The pipe was not flowing during the inspection.
Location: Southwest end of cattle pasture.
Camera Direction: East



7: RIMG0376
Description: Cattle feedlot on the north end of the [redacted] Beef site. Runoff from the feedlot is collected in the waste storage facility.
Location: North end of [redacted] Beef
Camera Direction: South



8: RIMG0377
Description: Cattle feedlot on the north end of the [redacted] Beef site. Runoff from the feedlot is collected in the waste storage facility.
Location: North end of [redacted] Beef
Camera Direction: Southwest

9: RIMG0378
Description: A solid manure stacking area was located at the north end of the [redacted] Beef site. Runoff from the manure stacking area is collect in the waste storage facility.
Location: North end of [redacted] Beef
Camera Direction: South

10: RIMG0379
Description: A pump station "gate" was located at the east end of the central feedlots.
Location: East end of the central feedlots at [redacted] Beef.
Camera Direction: West

11: RIMG0380
Description: A pump station "gate" was located at the east end of the central feedlots.
Location: East end of the central feedlots
Camera Direction: West
11Date/Time: September 6, 2018

12: RIMG0381
Description: A solids settling pond was located along a farm drive at the southern end of the [redacted]Beef site. The solids setlling pond is piped to the south under the farm drive and flows into a small ditch that is sloped to the west. The ditch flows to the large waste storage facility.
Location: South end of [redacted]Beef site.
Camera Direction: East

13: RIMG0382
Description: The solids setlling pond is piped to the south under the farm drive and flows into a small ditch that is sloped to the west. The ditch flows to the large waste storage facility.
Location: South end of [redacted]Beef site.
Camera Direction: East

14: RIMG0383
Description: The solids setlling pond is piped to the south under the farm drive and flows into a small ditch that is sloped to the west. The ditch flows to the large waste storage facility.
Location: South end of [redacted] Beef site.
Camera Direction: West

15: RIMG0384
Description: A large ditch forms and the flow continues west until is bends and continues south to the large waste storage facility.
Location: South end of [redacted] Beef site.
Camera Direction: East

16: RIMG0385
Description: The flow continues into a large ponded area and continues south to the large waste storage facility.
Location: South end of [redacted] Beef site.
Camera Direction: South

17: RIMG0386
Description: The flow continues into a large ponded area and continues south to the large waste storage facility.
Location: South end of [redacted] Beef site.
Camera Direction: North

18: RIMG0387
Description: The large waste storage facility was located at the south end of the [redacted] Beef site. The inspectors did not observed an operational level marker in the large waste storage facility.
Location: South end of [redacted] Beef site.
Camera Direction: South

19: RIMG0388
Description: A tractor driven manure pump was located at the east end of the large waste storage facility.
Location: East end of the large waste storage facility at the [redacted] Beef site.
Camera Direction: Northwest

20: RIMG0389
Description: A pump was located on the west end of the northwest waste storage facility.
Location: West end of the northwest waste storage facility
Camera Direction: East

21: RIMG0390
Description: A dead cow was observed at the east end of the barn the was south of the northwest waste storage facility.
Location: East end of the barn the was south of the northwest waste storage facility.
Camera Direction: South

22: RIMG0391
Description: The solid manure holding area is sloped to the southwest.
Location: Solid manure holding area at north end of the [redacted] Beef site.
Camera Direction: Northeast

23: RIMG0392
Description: A solids settling pond was located at the northeast end of the northwest waste storage facility. The solids settling pond connects to the northwest waste storage facility via an overflow ditch on the northwest end of the solids settling pond.
Location: Northeast end of the northwest waste storage facility
Camera Direction: West

24: RIMG0393
Description: A number of large trees were established along the northwest end of the northwest waste storage facility.
Location: northwest end of the northwest waste storage facility.
Camera Direction: Northeast

Attachment C

Illinois Environmental Protection Agency

Bureau of Water • 1021 North Grand Avenue East • P.O. Box 19276 • Springfield • Illinois • 62794-9276

Livestock Facility Inspection Checklist

GENERAL INFORMATION

Search by ☑ BOW ID ☐ Facility Name

BOW ID Number: W0738140002

Search

Facility Information

Facility Name: Ex. 5 (Deliberative Proc) Beef, Inc.

Type of Facility: CAFO Large (Concentrated Feeding Opera Inspection Type: CEI- Evaluation

Facility Address: Ex. 6 (Personal Privacy) City: Ex. 6 (Personal Privacy) State: IL Zip: Ex. 6 (Personal Privacy)

Region: Region 3 - Peoria County: Henry Section: 17 Range: 4-E

Township 18-N Political Township: Loraine

Inspection Information

Date: 01/26/2017 Arrival: 12:00 PM Departure: 2:40 PM Inspector: Todd Bennett

Temp: _____ Precipitation in past 24 hrs? ☑ Yes ☐ No Type: Rain Supervisor: Jim Miles

Latitude (Decimal N 00.000) Ex. 5 (Deliberative Process) ☐ GPS Measured Accompanied By (if applicable) Ex. 6 (Personal Privacy)

Longitude (Decimal W 00.000) Ex. 5 (Deliberative Process) ☒ Google Earth

Owner Information Same as Facility ☐

Owner Name: Ex. 5 (Deliberative Proce) Beef, Inc. Phone: Ex. 5 (Deliberative Process) Cell: ⊕ ⊖

Owner Address: Ex. 6 (Personal Privacy) City: Ex. 5 (Deliberative Process) State: IL Zip: 61254

Contacted? ☑ Yes ☐ No

Operator Information Same as Facility ☑

Operator Name: Ex. 6 (Personal Privacy) Ex. 6 (Personal Privacy) Phone: Ex. 6 (Personal Privacy) Cell: ⊕ ⊖

Operator Address: Ex. 6 (Personal Privacy) City: Ex. 5 (Deliberative Process) State: IL Zip: 61254

Contacted? ☑ Yes ☐ No

NPDES PERMIT INFORMATION

1. Has an NPDES Permit been issued? ☐ Yes ☑ No

FACILITY NUTRIENT MANAGEMENT INFORMATION

Does the facility have a Facility Nutrient Management Plan (NMP)? ☑ Yes ☐ No

1. How many TOTAL acres are available for land application under NMP? 3,000 acres
2. How many acres are READILY available for land application at the time of inspection? _____ acres
3. NMP estimated annual quantities of liquid waste 24,000,000 gallons
4. NMP estimated annual quantities of solid waste 500 tons
5. Does the facility have a contractor perform land application? ☐ Yes ☑ No
6. What type of land application equipment is available to the facility? (use ctrl-click to select multiple items)

7.	Does the facility calibrate the land application equipment?	☑ Yes	☐ No
8.	Does the facility land apply at least 100' from surface water conduits w/o 35' veg buffer?	☑ Yes	☐ No
9.	Facility land apply at least 150' from any water well?	☑ Yes	☐ No
10.	Facility land apply at least 200' from any surface water (without upgradient/diking? If no, explain	☑ Yes	☐ No
11.	Does the facility land apply at least 1/4 mile from any residences? If no, explain	☑ Yes	☐ No
12.	Does the facility have a storm water pollution prevention plan?	☑ Yes	☐ No
13.	Are there aerial maps of land app fields showing waterways, buffers, and field tiles?	☑ Yes	☐ No
14.	Does the facility have inclement weather/condition waste storage provisions?	☑ Yes	☐ No
15.	Expected crop yields for land application areas	☑ Yes	☐ No
16.	Inclement weather/conditions storage provisions	☑ Yes	☐ No
17.	A topographic map for production and land application including drainage, discharges, and waterways	☑ Yes	☐ No

FACILITY WITH NUTRIENT MANAGEMENT PLAN (NMP)

1.	Does the NMP reflect the current operational characteristics (number of animals, cropping, animals not in direct contact with Waters of the US, N & P land application rate, etc.)?	☐ Yes	☑ No
2.	Are the number of acres owned/leased consistent with those in the NMP?	☐ Yes	☑ No
3.	Are manure and wastewater being applied in accordance with setback/buffer requirements of the NMP?	☑ Yes	☐ No

FACILITY RECORDKEEPING - ALL FACILITIES

1.	Land application - Date, Time, Location rate(s)?	☑ Yes	☐ No
2.	Amount of livestock waste transferred off-site to another party?	☑ Yes	☐ No
3.	Total N and P applied and removed from the land application fields?	☑ Yes	☐ No
4.	Calculations deriving land application rates do not exceed N or P crop removal rates?	☑ Yes	☐ No
5.	Calculations showing adequate land for land application?	☑ Yes	☐ No
6.	Adequate storage levels for waste in Waste Handling System?	☑ Yes	☐ No
7.	Inspection and Maintenance of Waste Handling System?	☑ Yes	☐ No
8.	Chemicals, contaminants, and mortalities properly disposed - NOT directly disposed in Waste Handling System unless designated to treat or handle those materials?	☑ Yes	☐ No
9.	Clean water diverted from Waste Handling System?	☑ Yes	☐ No
10.	Animals not in direct contact with Waters of US	☑ Yes	☐ No
11.	Land application performed in accordance with setback/buffer/conservation practices?	☑ Yes	☐ No
12.	Protocols and test methods for routine soil and manure testing for land application?	☑ Yes	☐ No
13.	Protocols for nutrient utilization in land application field?	☑ Yes	☐ No
14.	Setbacks 150' - water well, 200' surface water (unless up gradient or adequate diking?	☑ Yes	☐ No
15.	Winter time land application plan (inc. setback, forecast 24 hr post land app, monitoring)?	☐ Yes	☐ No
16.	Subsurface drainage inspect during/after land app?	☐ Yes	☐ No
17.	A spill control and prevention plan?	☑ Yes	☐ No
18.	Annual review of the nutrient management practices and an update if warranted?	☑ Yes	☐ No
19.	Large unpermitted CAFO - Above records kept to meet ag storm water exemption?	☐ N/A ☑ Yes	☐ No

LIVESTOCK FACILITY DESCRIPTION

	Feature Name	Type of Confinement	Number of Animals	Animal Type	Capacity	

Feature Name	Type of Confinement	Number of Animals	Animal Type	Capacity	
A1	Open Concrete Feelots	60	Beef Cattle	60	+ -
A2	Open Concrete Feelots		Beef Cattle		+ -
B1	Open Concrete Feelots	60	Beef Cattle	60	+ -
B2	Open Concrete Feelots	60	Beef Cattle	60	+ -
B3	Open Confinement Bldg	60	Beef Cattle	60	+ -
B4	Open Confinement Bldg	60	Beef Cattle	60	+ -
H1	Open Concrete Feelots	60	Beef Cattle	60	+ -
H2	Open Concrete Feelots	60	Beef Cattle	60	+ -
H3	Open Concrete Feelots	100	Beef Cattle	100	+ -
H5	Total Confinement Bldg	150	Beef Cattle	150	+ -
H9	Total Confinement Bldg	60	Beef Cattle	60	+ -
H10	Total Confinement Bldg	75	Beef Cattle	75	+ -
HB	Open Concrete Feelots	55	Beef Cattle	55	+ -
C1/C2	Open Concrete Feelots	60	Beef Cattle	60	+ -
C3/C4	Open Concrete Feelots	60	Beef Cattle	60	+ -
C5/C6	Open Concrete Feelots	60	Beef Cattle	60	+ -
C7/C8	Open Concrete Feelots	60	Beef Cattle	60	+ -
D1	Open Concrete Feelots	90	Beef Cattle	90	+ -
D2	Open Concrete Feelots	90	Beef Cattle	90	+ -
D3	Open Concrete Feelots	120	Beef Cattle	120	+ -
D5	Open Concrete Feelots	60	Beef Cattle	60	+ -
D6	Open Concrete Feelots	150	Beef Cattle	150	+ -
D9	Open Earth Feedlot	150	Beef Cattle	150	+ -
F1	Open Confinement Bldg	40	Beef Cattle	40	+ -
F2	Open Confinement Bldg	60	Beef Cattle	60	+ -
F3	Open Confinement Bldg	60	Beef Cattle	60	+ -
F4	Open Confinement Bldg	60	Beef Cattle	60	+ -
F5	Open Confinement Bldg	60	Beef Cattle	60	+ -
F6	Open Confinement Bldg	60	Beef Cattle	60	+ -
F7	Open Confinement Bldg	60	Beef Cattle	60	+ -
F8	Open Confinement Bldg	115	Beef Cattle	115	+ -
F9	Open Confinement Bldg	115	Beef Cattle	115	+ -
F10	Open Confinement Bldg	115	Beef Cattle	115	+ -
F11	Open Confinement Bldg	115	Beef Cattle	115	+ -
F12	Open Confinement Bldg	115	Beef Cattle	115	+ -
F13	Open Confinement Bldg	65	Beef Cattle	65	+ -
R1	Open Concrete Feelots		Beef Cattle		+ -

Does the facility have an Illinois Certified Livestock Manager (300 or greater animal units)? ☐ N/A ☑ Yes ☐ No

If greater than 1,000 animal units but less than 5,000 animal units, does the facility have a waste management plan? ☐ N/A ☑ Yes ☐ No

If greater than 5,000 animal units, has the facility submitted a waste management plan to the Illinois Department of Agriculture for review? ☑ N/A ☐ Yes ☐ No

Does the facility have any other locations under common ownership, or where equipment and/or manure is shared, or where the other site shares land application sites? If so, put name and addresses below. ☐ Yes ☑ No

LIVESTOCK WASTE STORAGE

1. Does the facility have any existing livestock waste containment system? ☑ Yes ☐ No
2. Does the system have an outfall or discharge point? ☐ Yes ☑ No
3. Are there any portions of the production area where runoff is not controlled? ☑ Yes ☐ No
4. Is storm water entering the production area or waste handling system? ☐ Yes ☑ No

MORTALITIES MANAGEMENT

1. How are mortalities managed? (Composted, buried, burned, rendering service, other)

   Rendering

2. Are mortalities managed so all runoff/leachate is contained? ☑ Yes ☐ No
3. Are mortalities documented and are records kept? ☑ Yes ☐ No

FACILITY WATER SOURCES

1. What type of method is used to provide drinking water for the animals? (use ctrl-click to select multiple items)

   Water Bowls

2. How is the water for animals obtained? (use ctrl-click to select multiple items)

   On-Site Well

3. Is a mist cooling system used? ☐ Yes ☑ No

DAIRY OPERATION

1. Is this a dairy operation? ☐ Yes ☑ No

BEDDING

1. Does this facility have bedding? ☐ Yes ☑ No

MANURE COLLECTION

Is manure collected? ☐ Yes ☐ No

LAND APPLICATION AREA INSPECTION (if Facility Recently or is Actively Land Applying)

Is the land application area being inspected? ☑ Yes ☐ No

FEED STORAGE CONTAINMENT

1. Describe how feed (silage, hay, etc.) is contained. (use ctrl-click to select multiple items)

   Hay in Barn
   Silo
   Hay Outdoor

2. Describe how feed (silage, hay, etc.) runoff is contained. (use ctrl-click to select multiple items)

   Other
   None

RECEIVING SURFACE WATERS

1. Provide a description of the flow path from the facility to the nearest named surface water.

Storm water runoff generally flows east and southeast via unnamed tributaries

2. What is the name of the receiving stream? Big Slough Ditch

3. Status of the named surface water: ☐ Intermittent ☑ Perennial

4. Are any unnatural bottom deposits observed in the receiving stream? ☐ Yes ☑ No

DISCHARGES

1. Have there been any documented discharges of livestock waste to surface water **in the past year**? ☐ Yes ☑ No

2. Is the facility currently discharging livestock waste from the production area? ☐ Yes ☑ No

BIOSECURITY - INSPECTION ACTIVITIES

1. Were biosecurity measures discussed with the facility prior to inspection? ☑ Yes ☐ No

2. Has there been 24-hours downtime between inspections for all IEPA personnel persent? ☑ Yes ☐ No

3. Was the order of inspection conducted from high risk to low risk? ☑ N/A ☐ Yes ☐ No

4. Did all personnel stay outside livestock management and livestock waste handling facilities as defined in 35 IAC 501.285 and 35 IAC 501.300? ☑ Yes ☐ No

BIOSECURITY - PERSONAL PROTECTION EQUIPMENT

5. Was sanitary footwear donned prior to entering the livestock management waste handling facility(ies)? ☒ N/A ☐ Yes ☐ No
Did not enter

6. Were disposable coveralls donned prior to entering the livestock management/waste handling facility(ies)? ☑ N/A ☐ Yes ☐ No
Did not enter

7. Was sanitary footwear used during the inspection? ☑ Yes ☐ No

8. Was disposable sanitary outerwear disposed at the facility? ☐ Yes ☑ No

BIOSECURITY - VEHICLE

9. Was the vehicle parking location discussed with the facility prior to inspection? ☑ Yes ☐ No

10. Was the vehicle washed since the inspection prior to current? ☑ Yes ☐ No

11. Was the vehicle parked >300 feet from the livestock management/waste handling facility? Explain where vehicle was parked: ☐ N/A ☐ Yes ☐ No

Parked per the direction o[redacted]

12. Was Illinois EPA vehicle used on site? ☐ Yes ☑ No

13. Was vehicle used on site? ☑ Yes ☐ No

BIOSECURITY - INSPECTION EQUIPMENT

14. Was all equipment wiped down with anti-bacterial wipes? ☐ Yes ☑ No

15. Was sample cooler kept inside vehicle during inspection? ☑ Yes ☐ No

16. Was sample cooler wiped down with antibacterial wipes before placing back into vehicle? ☐ N/A ☐ Yes ☐ No

OTHER COMMENTS/NOTES

The following were reviewed during inspection: (use ctrl-click to select multiple items)

CNMP
Records
Confinement Buildings
Feedlot

ATTACHMENTS

Narrative
Photos
Site Plan

Comments

Report Creation Date: 04/28/2017 Report Submission Date: 04/28/2017

Submit Form

Figure 1 - Aerial View of Ex. 6 (Personal Privacy) Beef, Inc.

(Google Earth, May 12, 2015)

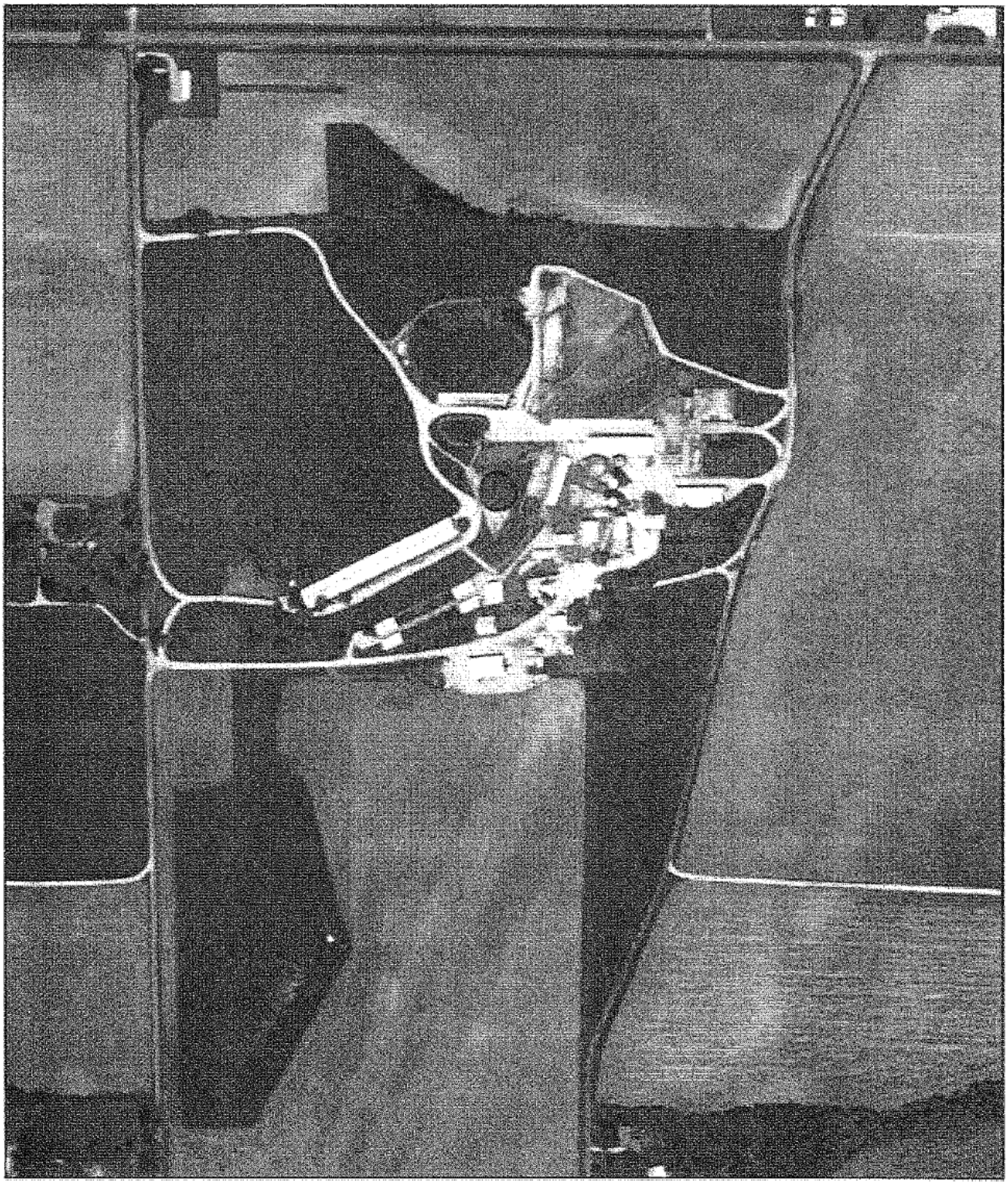


Figure 2 - Topographical Map of [redacted] Beef, Inc.

(Spring Hill US Topo, USGS, 2015)

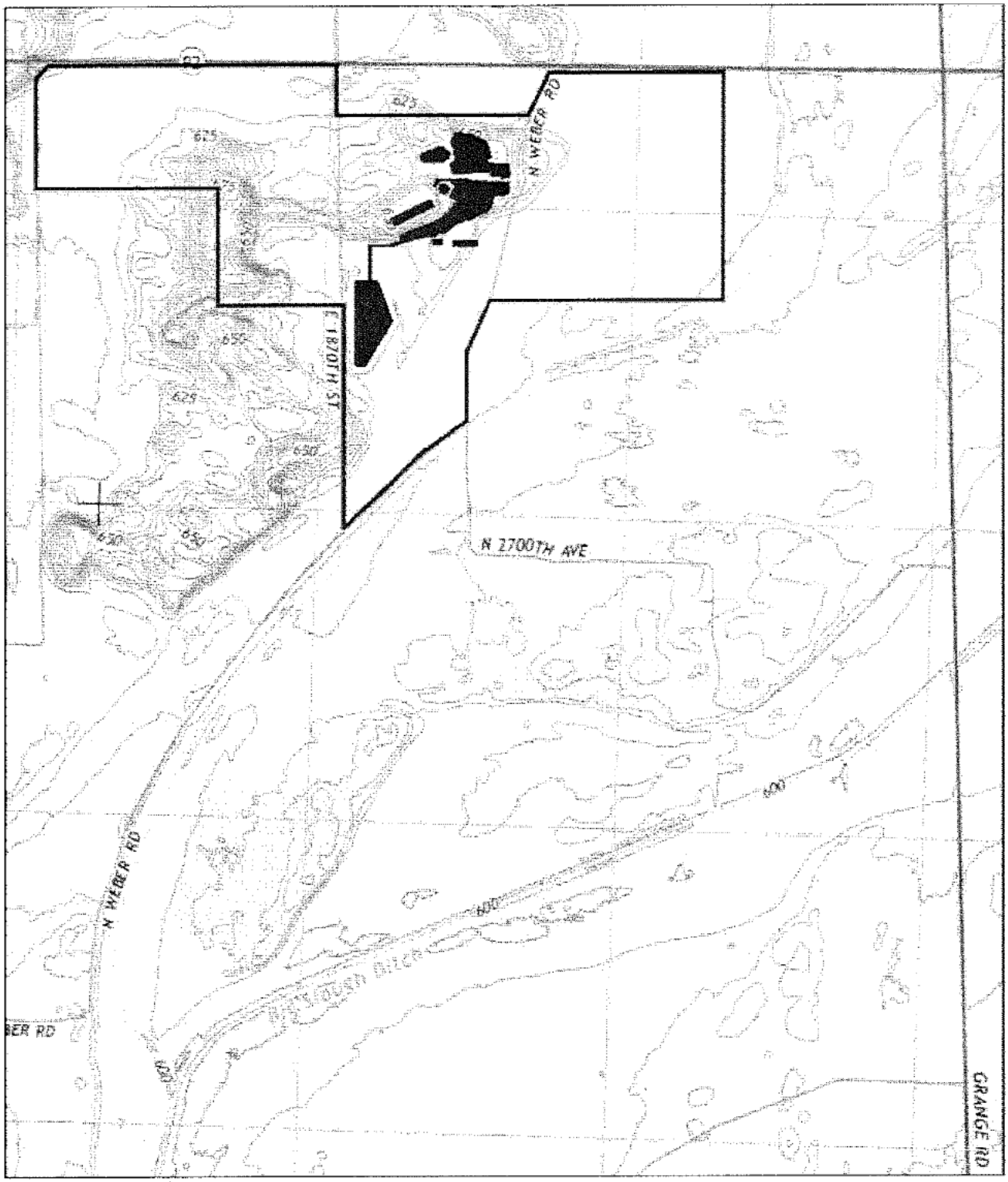
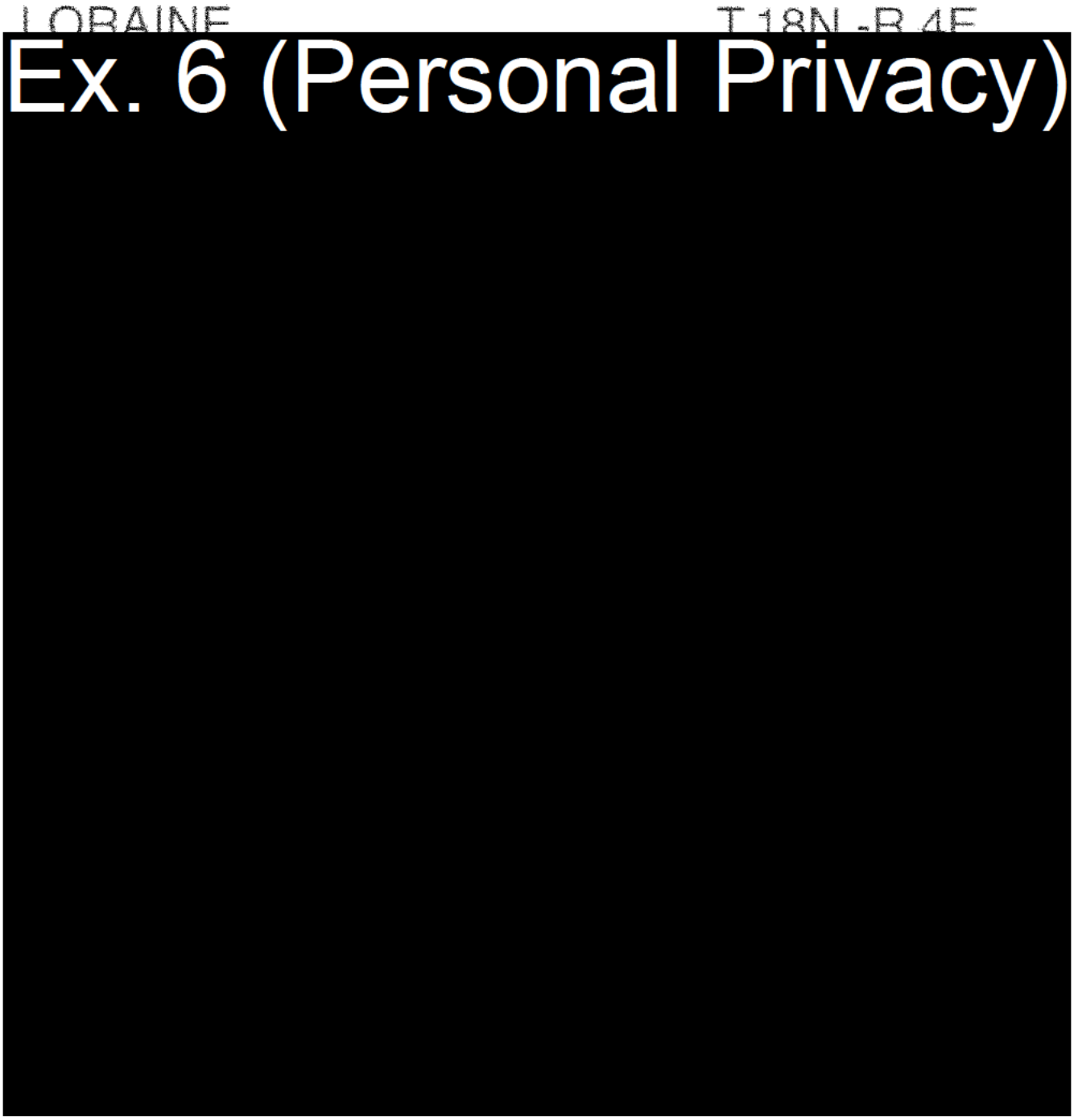


Figure 3 - Plat Map of [redacted] Beef, Inc.

(Land Atlas & Plat Book, Henry County, Illinois, 2006)

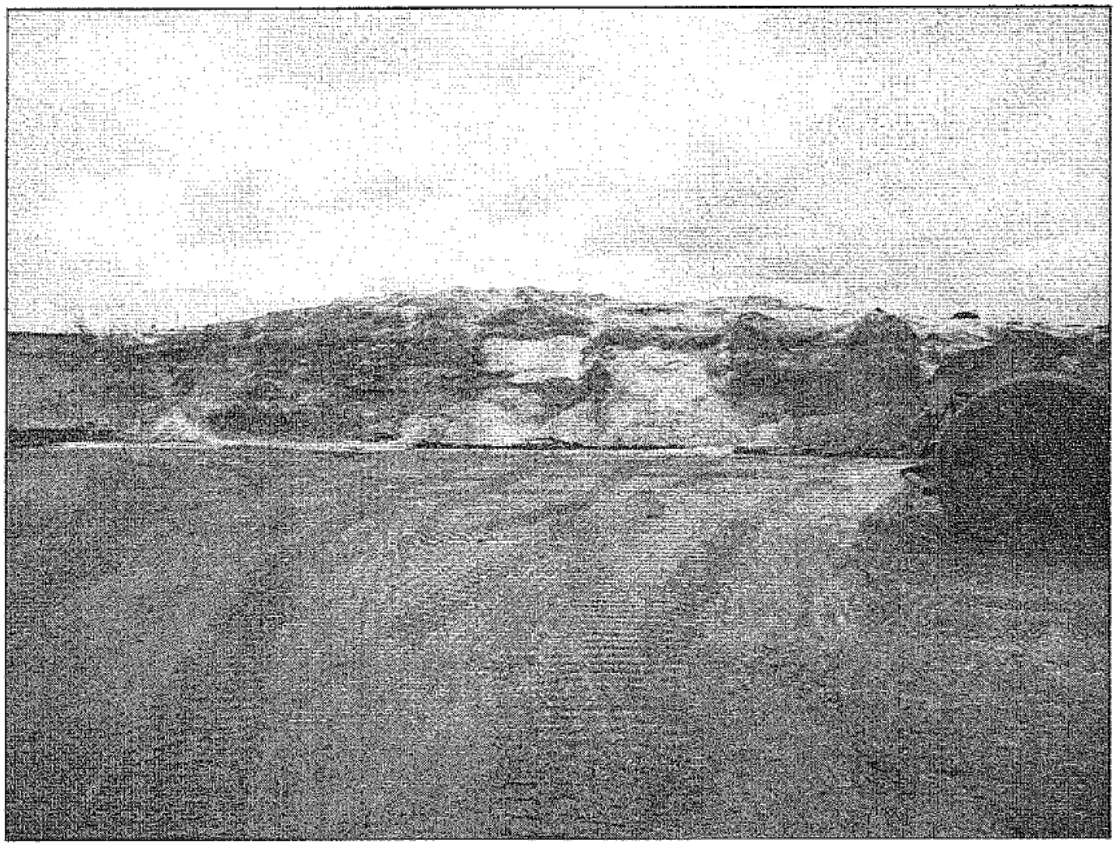


Facility: [redacted] Beef, Inc.

Photograph #1

1/26/2017
Todd A. Bennett

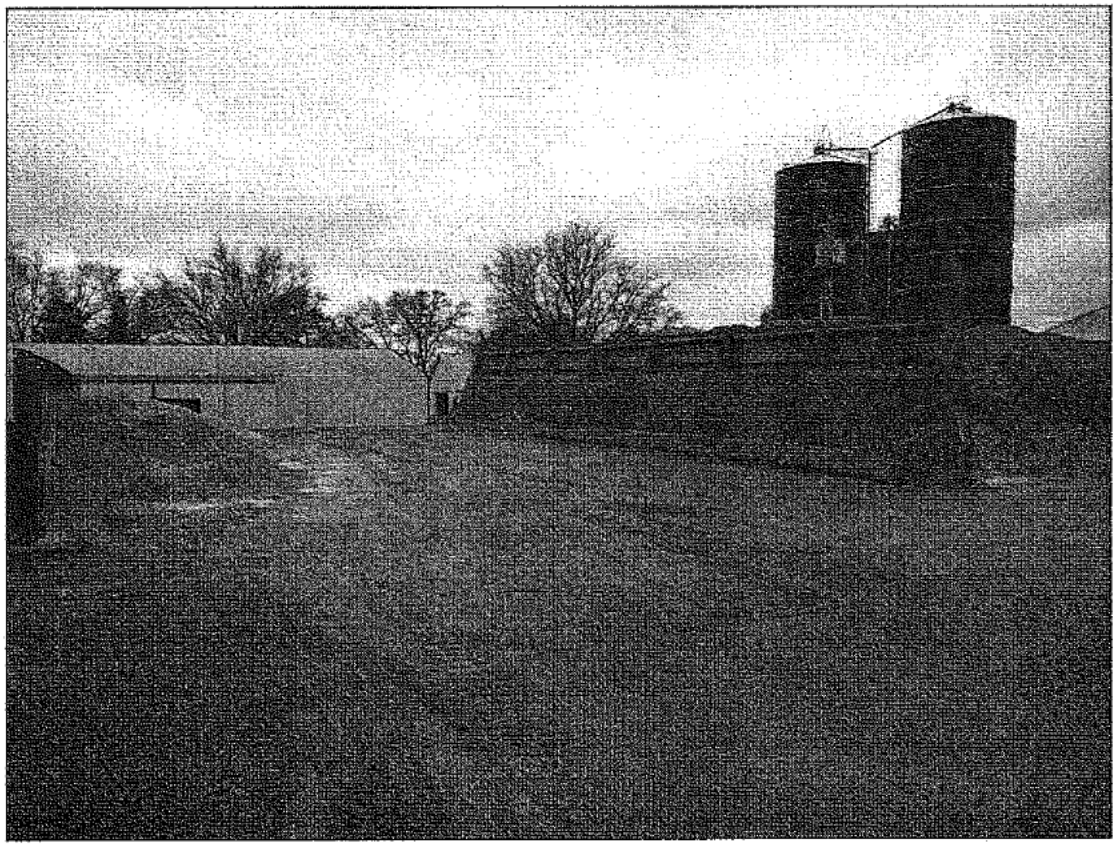
View toward the north of a large stockpile of DDGS along northern wall of Feed Bunk



Photograph #2

1/26/2017
Todd A. Bennett

View toward the southwest of the Feed Bunk and stockpile of Tyson Foods, Inc. byproduct material (right)

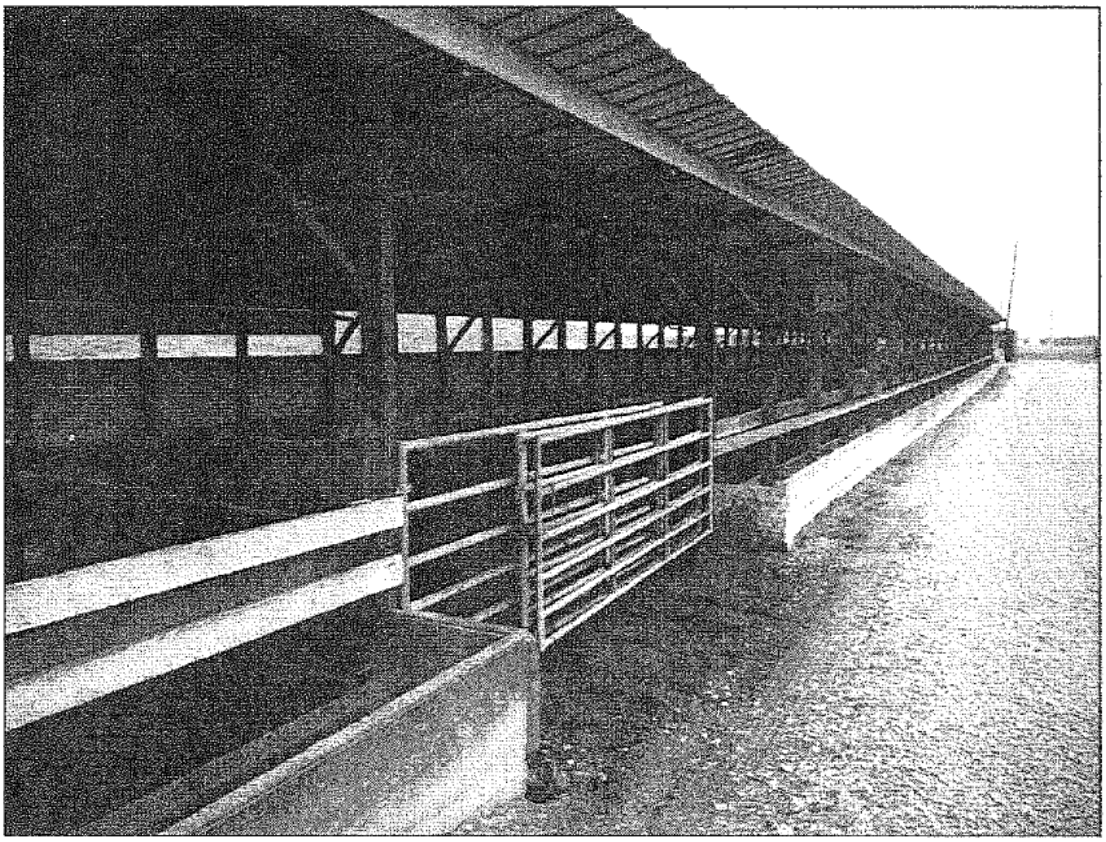


Facility [redacted] Beef, Inc.

Photograph #3

1/26/2017
Todd A. Bennett

View toward the northeast of Barn H10



Photograph #4

1/26/2017
Todd A. Bennett

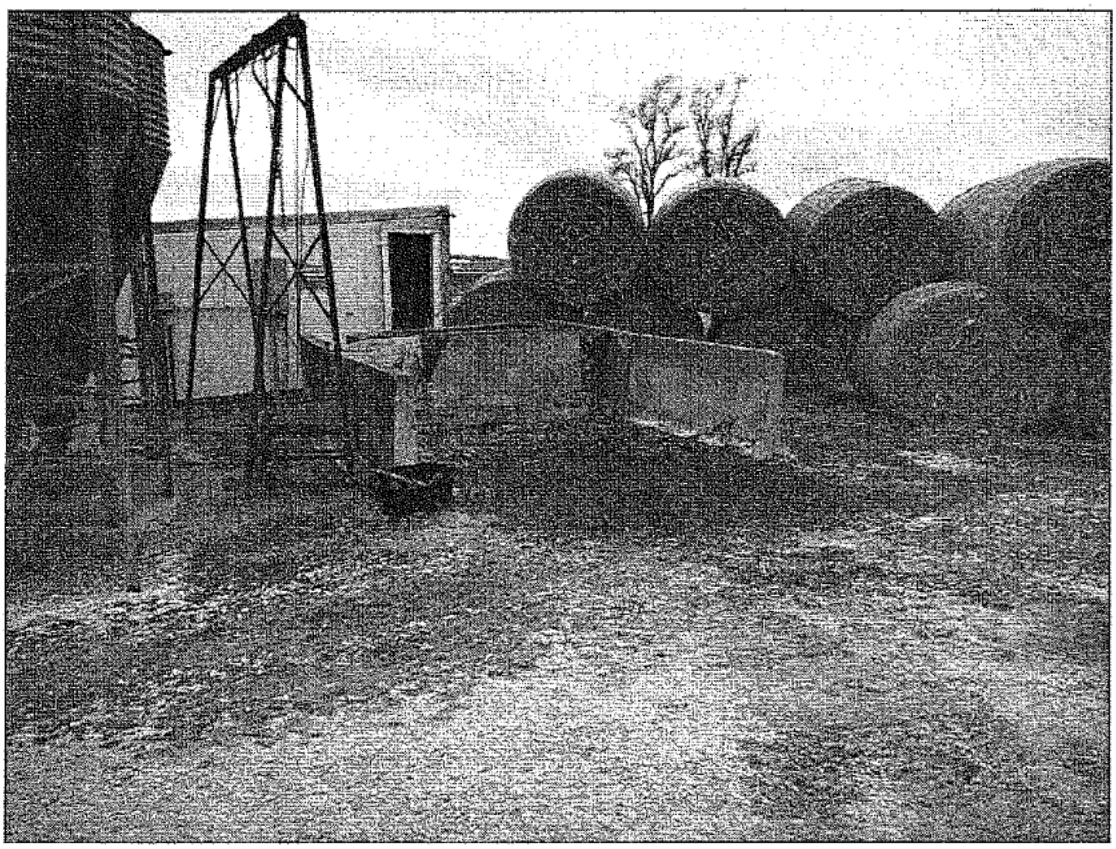
View toward the northeast of Lots D6 and D9

Facility Ex. 6 (Personal Privacy) Beef, Inc.

Photograph #5

1/26/2017
Todd A. Bennett

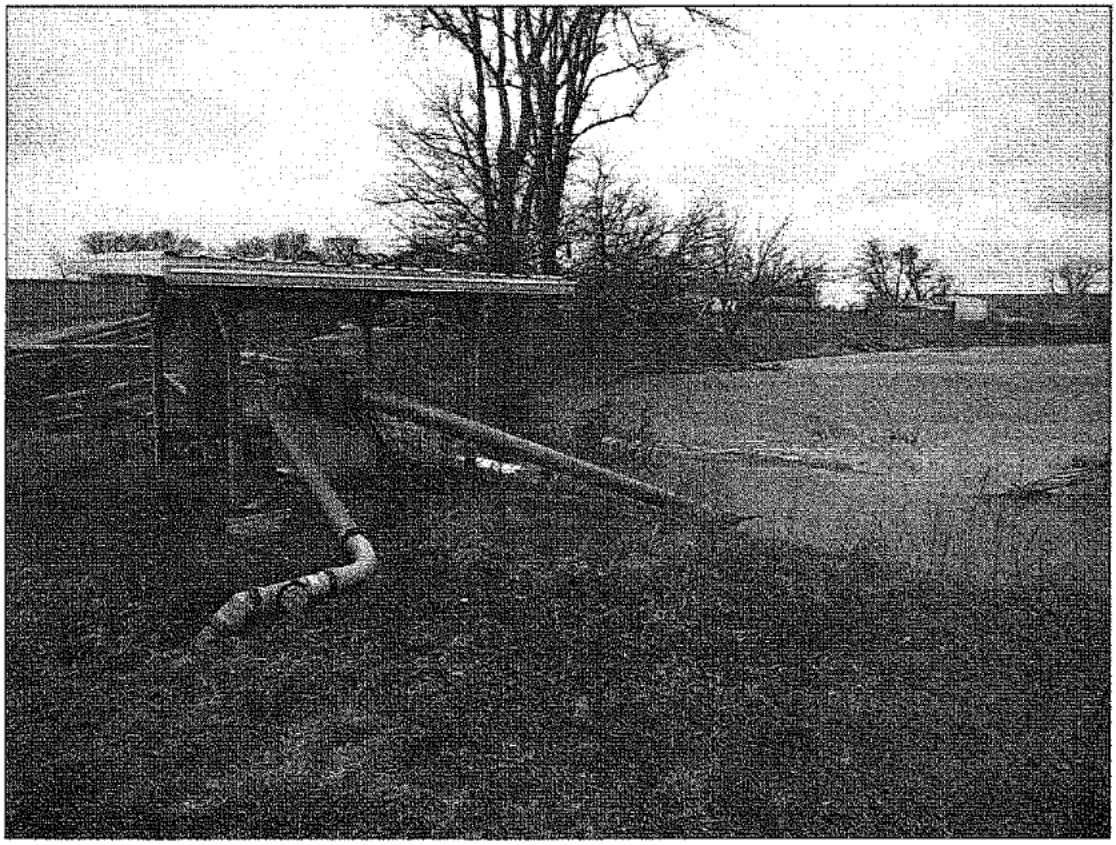
View toward the west of the mortality storage bunker



Photograph #6

1/26/2017
Todd A. Bennett

View toward the northeast of the irrigation pump for Storage Pond 2



Facility [redacted] Beef, Inc.

Photograph #7

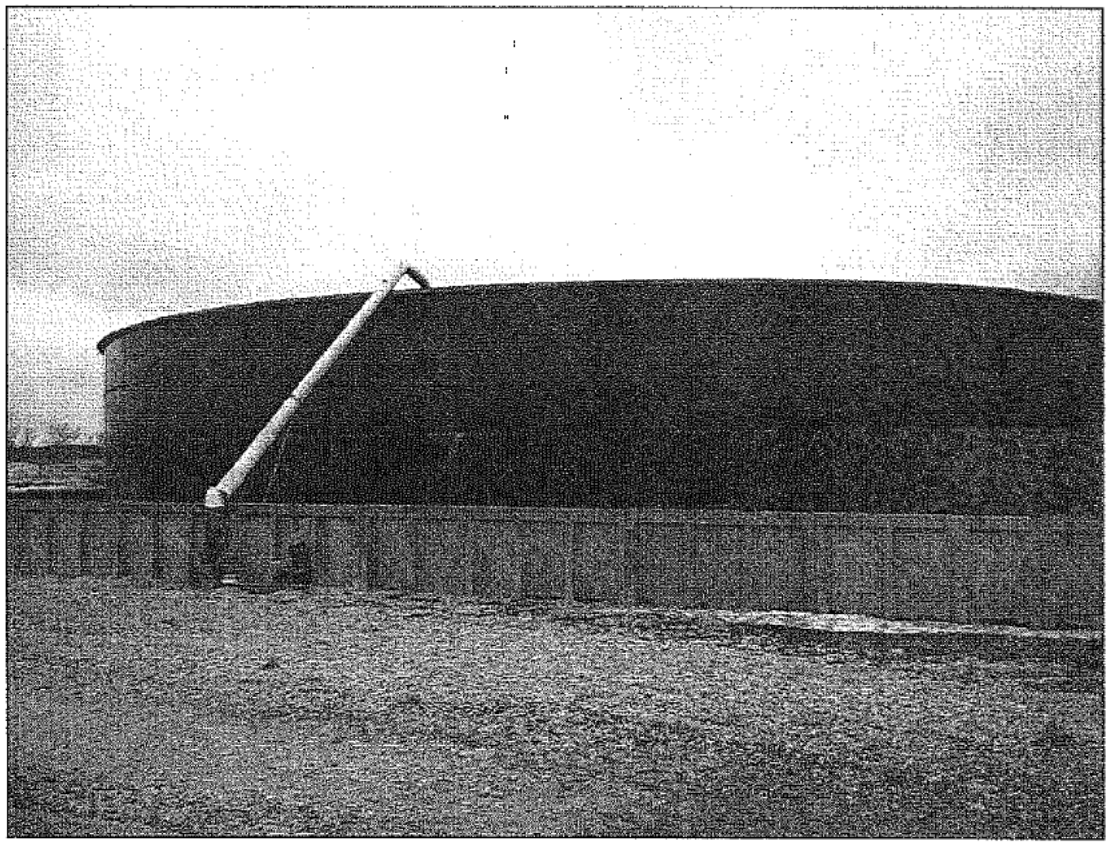
1/26/2017
Todd A. Bennett

View toward the west of the land application field and center pivot system serving Storage Pond 2

Photograph #8

1/26/2017
Todd A. Bennett

View toward the northeast of the above ground storage tank with over-the-top fill

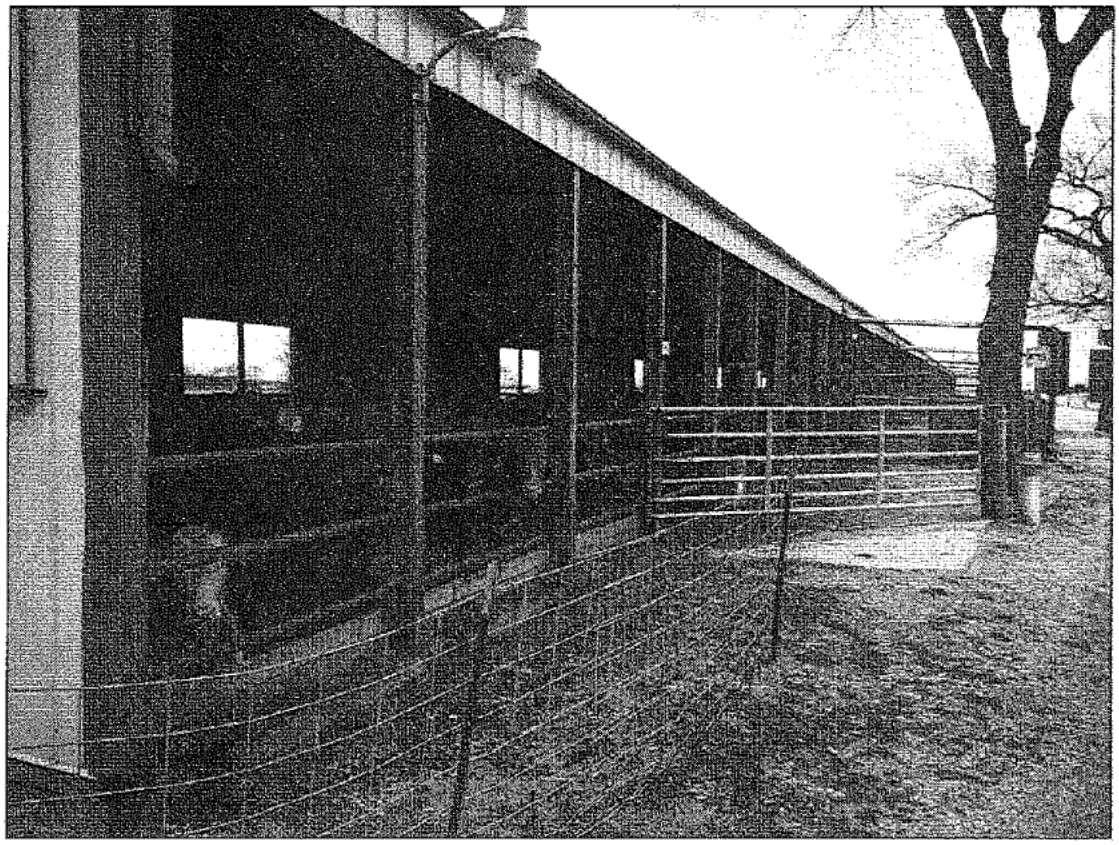


Facility [redacted] Beef, Inc.

Photograph #9

1/26/2017
Todd A. Bennett

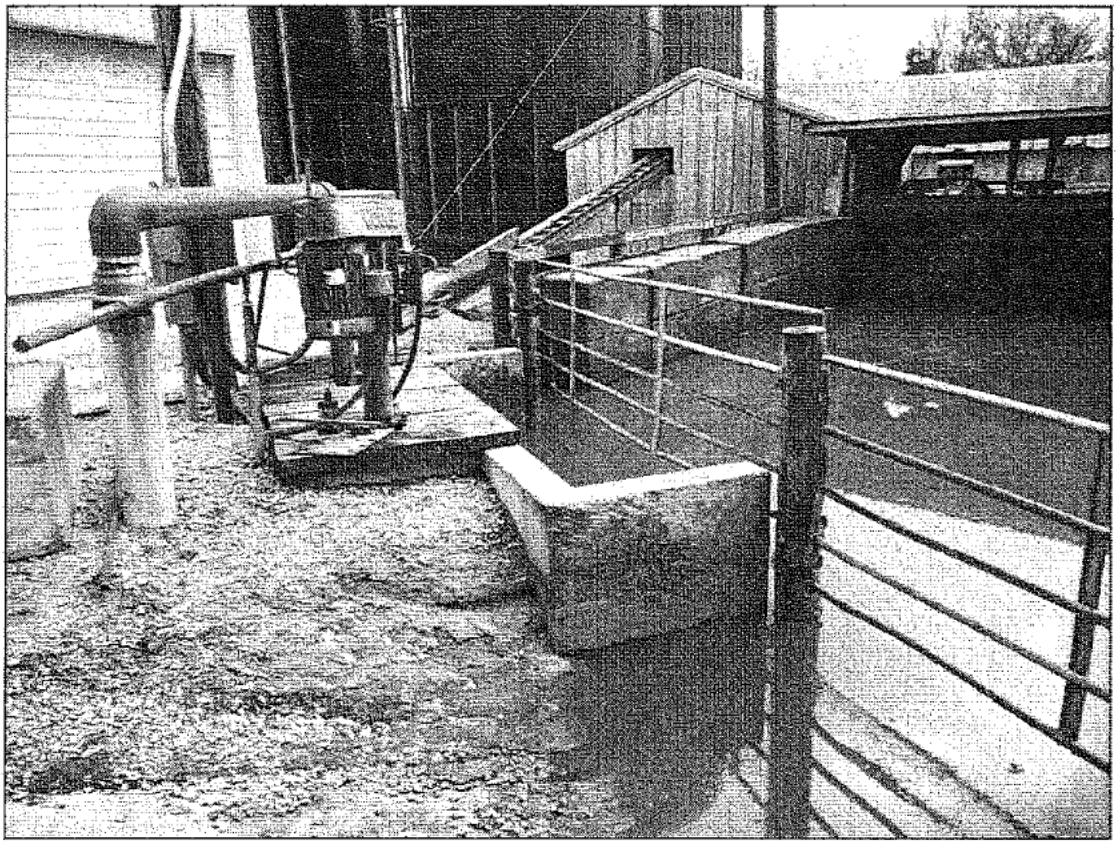
View toward the northeast of Stalls F1 through F13



Photograph #10

1/26/2017
Todd A. Bennett

View toward the south of a runoff collection sump and lift station



Facilit[Ex. 6 (Personal Privacy)] Beef, Inc.

Photograph #11

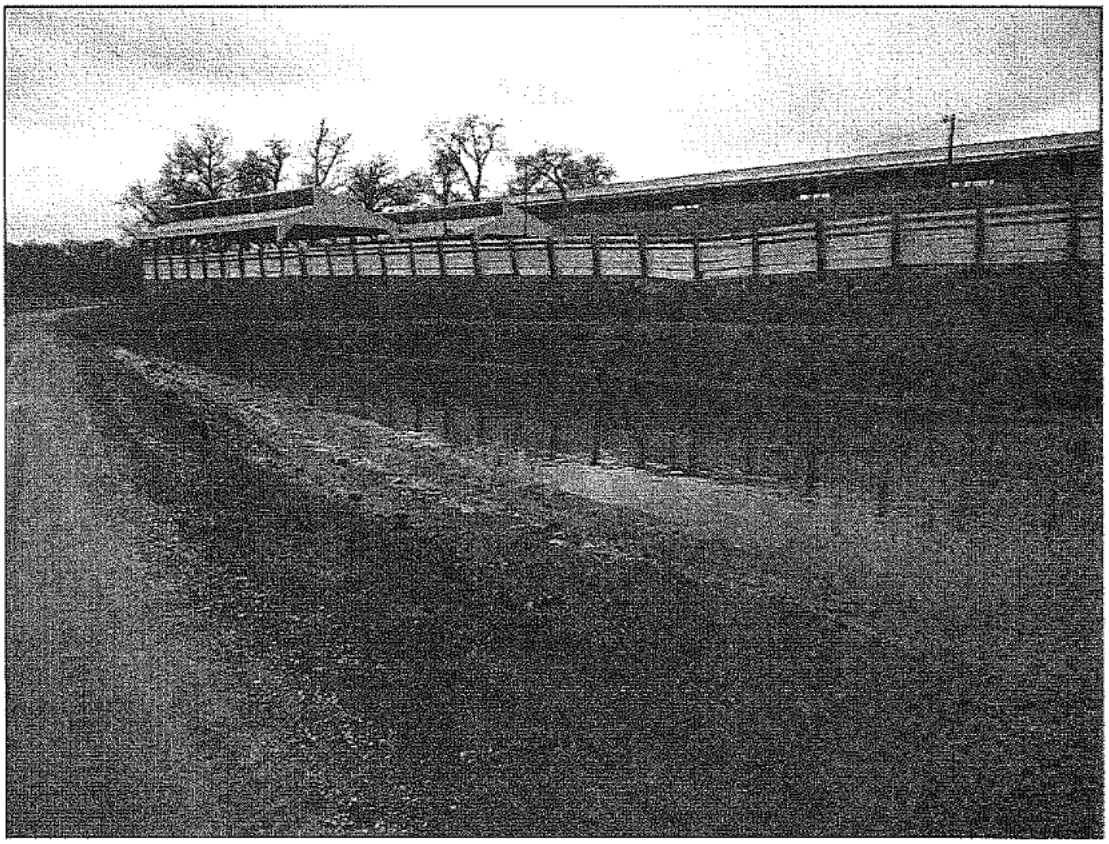
1/26/2017
Todd A. Bennett

View toward the northeast of the drain line outfalls to Settling Pond 1

Photograph #12

1/26/2017
Todd A. Bennett

View toward the northwest of the drainage path from Settling Pond 1 to Storage Pond 1



Facility: [redacted] Beef, Inc.

Photograph #13

1/26/2017
Todd A. Bennett

View toward the south of the drainage canal between Settling Pond 1 and Storage Pond 1

Photograph #14

1/26/2017
Todd A. Bennett

View toward the south of Storage Pond 1

Facility: [redacted] Beef, Inc.

Photograph #15

1/26/2017
Todd A. Bennett

View toward the west of the land application field that received a surface application of manure solids that day

Photograph #16

1/26/2017
Todd A. Bennett

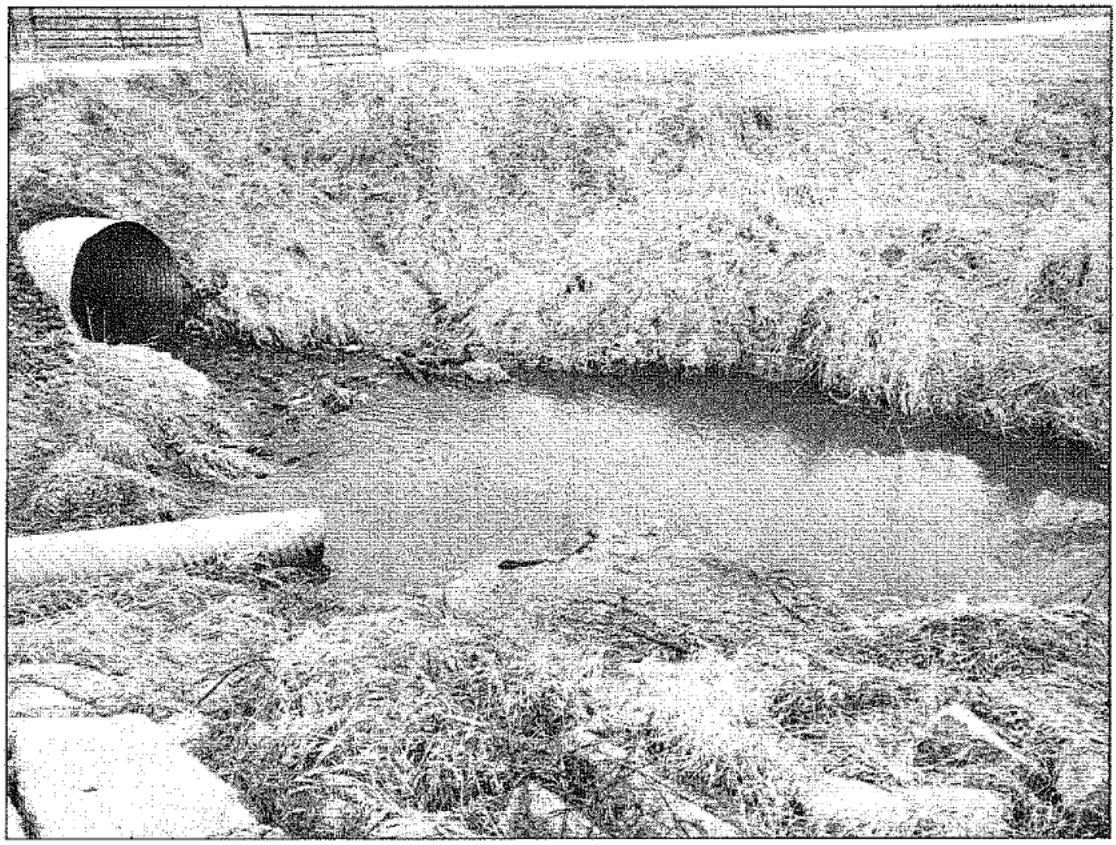
View toward the north of unnamed tributary to Big Slough Ditch at its crossing of Illinois Route 92, upstream of the facility

Facility: [redacted] Beef, Inc.

Photograph #17

1/26/2017
Todd A. Bennett

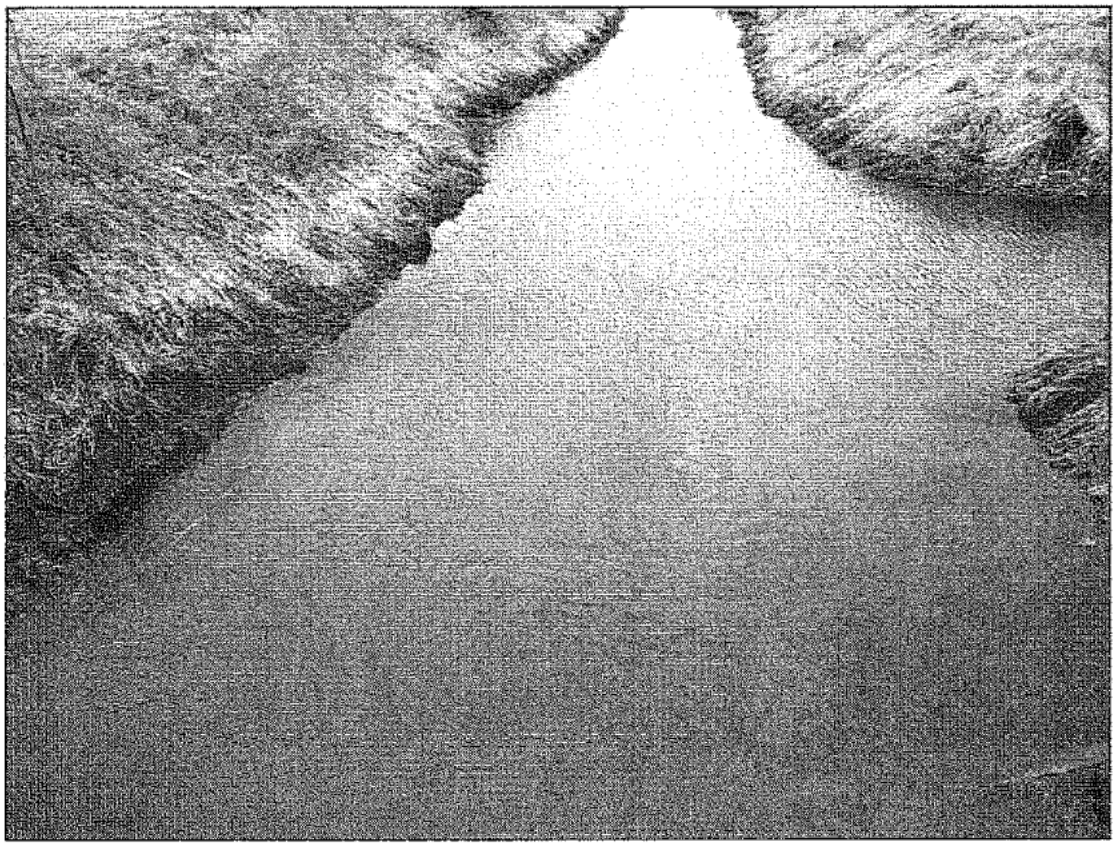
View toward the southeast of the unnamed tributary to Big Slough Ditch along Weber Road, downstream of the facility



Photograph #18

1/26/2017
Todd A. Bennett

View toward the north of Big Slough Ditch at its crossing of County Road 2500 North, downstream of the facility



Inspection Narrative

Facility Name: [redacted] Beef, Inc.
BOW ID: W0738140002
IEPA Inspector: Todd A. Bennett, FOS-Peoria
Inspection Date: January 26, 2017

Prior to my arrival at [redacted] Beef, Inc., I observed the conditions of surface waters upstream and downstream of the facility. An unnamed tributary to Big Slough Ditch (Stream Code PBG) runs along the eastern part of the facility's property; the distance to the stream from the facility's production area ranges from 1,500 to 3,000 feet. The stream at the upstream location, at its crossing of Illinois Route 92, was approximately 6 inches deep, clear, and flowing at approximately 1 foot per second. I observed no live or dead fish and no unusual odor. The stream temperature was 3.6 degrees Celsius, and the dissolved oxygen concentration was 10.4 milligrams per liter. The stream at the downstream location, just off [redacted] Road approximately 1,900 feet south of the production area, was approximately 1 foot deep, moderately turbid, and flowing at approximately 3 inches per second. There is a short fall from a culvert that produced some foam. The turbidity was likely due to mixing as a result of the fall and the depth of the water. I observed no live or dead fish and no unusual odor. The stream temperature was 3.9 degrees Celsius, and the dissolved oxygen concentration was 10.8 milligrams per liter.

While I was making the stream observations, at approximately 11:35 AM, I observed land application activity in the field directly east of the facility's production area. A worker was applying solid livestock waste to the field surface via a manure spreader. The field surface was not frozen, ice-covered, or snow-covered. The soil in this part of Henry County has a high sand content and, therefore, a high permeability. The entire field is in a depression and does not require ditch drainage. There appeared to be no risk to area surface waters from this application of livestock waste.

At 12:00 PM, I met [redacted] We decided to conduct the inspection of the facility first; [redacted] drove us through the facility, stopping to make observations and take pictures as necessary.

The Feed Bunk is located at the northeast part of the facility. It consists of a concrete pad and concrete walls and partitions. All of the stockpiled materials, except the hay and corn stalks, are uncovered, including gluten, dried distiller's grain with solubles ("DDGS"), corn silage, and a fermented byproduct from the Tyson Fresh Meats, Inc. plant in Joslin, Illinois. Facility employees scrape the Feed Bunk daily with a skid-steer equipped with a "squeegee" scraper mechanism that [redacted] constructed. There was a thin layer of feed material on the concrete surface of the pad and some small pools of leachate, but I observed no leachate flow from the Feed Bunk during the inspection.

All of the open lots and confinement pens drain livestock waste to various settling and storage ponds around the facility or to a sump and lift station, which directs the livestock waste to the above ground storage tank. According to observations during the inspection, [redacted] Beef, Inc.

appears to provide adequate collection and storage of livestock wastes at the facility. I did not observe any overflows of livestock waste and no indication of an active discharge of pollutants to waters of the United States. Due to the sandy conditions of the area soils, [redacted] Beef, Inc. periodically adds fresh water to the storage ponds in order to provide a sufficient supply of irrigation water throughout the summer. Each storage pond has a devoted pump, which allows [redacted] Beef, Inc. to transfer liquid livestock waste between the storage ponds and the above ground storage tank as necessary.

At the time of the inspection, [redacted] Beef, Inc. also leased two small lots, the Woodrum Lot and the Mosher Lot, which are both north of Illinois Route 92. The Woodrum Lot confines up to 299 beef cattle, and the Mosher Lot confines up to 80 beef cattle. Because these two facilities are under different ownership, they are not included as part of the same animal feeding operation as the [redacted] Beef, Inc. facility.

After the inspection of the facility, we returned to the office, and I reviewed the current Nutrient Management Plan ("NMP") and associated records. Maurer-Stutz, Inc. prepared the NMP and was working on a revision of it to account for upcoming changes to the structure of the family business. I asked [redacted] to provide me a summary of all of the confinement spaces and capacities for the entire facility; he did so via e-mail on April 27, 2017. I provided [redacted] a copy of Subtitle E of Title 35 of the Illinois Administrative Code ("Subtitle E"), which contains the regulations for agricultural-related pollution, and summarized the list of requirements for unpermitted Large CAFO facilities in Section 502.510(b). I encouraged him to contact Maurer-Stutz to ensure that they incorporate all of the applicable items in this section into the revision of the NMP.

According to my observations during the inspection, [redacted] Beef, Inc. appears to operate the facility in accordance with all applicable requirements of Subtitle E. I observed no indication of an active discharge of livestock waste to waters of the United States. [redacted] Beef, Inc. appears to have no duty to apply for NPDES permit coverage at this time.